

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MOTOROLA SOLUTIONS INC.,)	
)	
Plaintiff,)	Case No. 1:17-cv-1972
)	
v.)	Judge John Robert Blakey
)	
HYTERA COMMUNICATIONS)	Magistrate Judge Michael T. Mason
CORPORATION LTD., HYTERA)	
AMERICA, INC., AND HYTERA)	
COMMUNICATIONS AMERICA (WEST),)	
INC.)	
)	
Defendants.)	

**UNOPPOSED MOTION FOR EXTENSION OF TIME FOR HYTERA
COMMUNICATIONS CORP. LTD.
TO ANSWER OR OTHERWISE PLEAD**

Defendant Hytera Communications Corp. Ltd. requests the entry of an Order granting an extension of time to answer or otherwise plead in response to the Complaint through and including May 5, 2017 and in support thereof state as follows:

1. On March 14, 2017, Plaintiff filed the Complaint against Hytera Communications Corp. Ltd., a China corporation, and the two “Hytera U.S. Defendants,” Hytera America, Inc and Hytera Communications America (West), Inc.
2. On April 3, the Hytera U.S. Defendants filed a motion for an extension of time to answer or otherwise plead until May 5, 2017. (Dkt. No. 14). The Hytera U.S Defendants’ motion for an extension was granted; their deadline to answer or otherwise plead is May 5, 2017. (Dkt. No. 16).
3. On April 5, 2017, Motorola Solutions filed a return of summons, which indicated

that Hytera Communications Corp. Ltd.'s answer is due April 20, 2017. (Dkt. No. 21). Without admitting sufficiency of service of process, Hytera Communications Corp. Ltd. requests an extension of time to answer or otherwise plead until May 5, 2017.¹

4. The requested extension is sought for the convenience of the Parties and the Court, placing all Defendants on the same schedule. No previous extensions have been sought by Hytera Communications Corp. Ltd.
5. This Motion is not being brought in bad faith or to delay or prejudice any of the parties.
6. Counsel for Plaintiff does not oppose the relief sought thereby.

WHEREFORE, Hytera Communications Corp. Ltd. requests that this Court enter an Order granting it an extension through and including May 5, 2017 to answer or otherwise plead.

DATED: April 17, 2017

Respectfully submitted,

By: /s/ Jeffrey J. Catalano

Jeffrey J. Catalano (IL Bar. No. 628197)
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Counsel for Hytera Communications Corp. Ltd.

¹ Hytera Communications Corp. Ltd. expressly reserves its right to contest sufficiency of process under Rules 12(b)(4) and/or 12(b)(5) of the Federal Rules of Civil Procedure.

CERTIFICATE OF SERVICE

I hereby certify that on April 17, 2017, a true and correct copy of the foregoing Stipulated Motion for Extension of Time to Answer or Otherwise Plead was served as electronic notice to the counsel of record via the CM/ECF electronic filing system.

DATED: April 17, 2017

Respectfully submitted,

By: /s/ Jeffrey J. Catalano

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